

CHORA YOUNG & MANASSERIAN LLP

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Attorneys for JS Partners 1, LLC

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA—SAN FERNANDO VALLEY DIVISION

In re:

Jayesh Kumar,

Debtor.

Chapter 13

Case No.: 1:24-BK-10985-VK

**DECLARATION OF JAHANZEB PIRVANI
IN SUPPORT OF JS PARTNERS 1, LLC'S
OBJECTION TO DEBTOR JAYESH
KUMAR'S CHAPTER 13 PLAN**

Continued 341(a) Meeting of Creditors:

Date: August 28, 2024

Time: 3:00 p.m.

Location: via Zoom Video Conference

Plan Confirmation Hearing:

Date: August 13, 2024

Time: 9:30 a.m.

Location: 21041 Burbank Boulevard
Courtroom 301
Woodland Hills, California 91367

I, Jahanzeb Pirvani, declare and state as follows:

1. I am over the age of eighteen.

2. I am the sole member of JS Partners 1, LLC (hereinafter "JS Partners").

3. I have personal knowledge of the matters set forth in this declaration and, if called as

a witness, could and would testify competently hereto.

4. I am making this declaration in support of *JS Partners 1, LLC's Objection to Debtor Jayesh Kumar's Chapter 13 Plan*.

5. JS Partners is a secured creditor of debtor Jayesh Kumar.

6. JS Partners' secured claim arises from a California money judgment domesticated from a default judgment entered by the New York Supreme Court, County of New York and a properly recorded abstract of judgment.

7. On June 7, 2021, the Debtor entered into a promissory note with JS Partners for the principal sum of \$270,000.00 ("Note"). A true and correct copy of the Note is attached hereto as Exhibit "A".

8. The Debtor defaulted with a \$110,000 principal balance remaining and JS Partners filed suit in New York (the "NY Suit") according to the terms of the Note.

9. The clerk of the court in the New York Suit entered default judgment in the total amount of \$139,307.03 in favor of JS Partners on October 3, 2022 (the "NY Judgment"). A true and correct copy of the NY Judgment is attached hereto as Exhibit "B".

10. Shortly thereafter, JS Partners applied to the Los Angeles Superior Court for entry of a sister-state judgment based on the NY Judgment to pursue the Debtor's assets in California.

11. On May 3, 2023, the LA Superior Court entered the *Judgment Based on Sister Statement Judgment (Code Civ. Proc. § 1710.25)* (the "Domesticated Judgment") in the amount of \$139,307.03 together with interest of \$7,076.03 and superior court filing fees of \$435. A true and correct copy of the Domesticated Judgment is attached hereto as Exhibit "C".

12. The Debtor was served with the notice of entry of sister-state judgment and JS Partners' application, in accordance with California Code of Civil Procedure on August 6, 2023.

13. After waiting the 30 days prescribed by California law, JS Partners obtained an abstract of judgment for the Domesticated Judgment from the Los Angeles Superior Court and promptly recorded the abstract and thereafter an amended abstract with the Los Angeles County Recorder's Office to secure its claim. A true and correct copy of the Recorded Abstract as amended is attached hereto as Exhibit "D".

1 14. Despite JS Partners' claim against the Debtor, the Debtor did not include JS Partners
2 in his Creditor Matrix, Schedules D or E/F or in his proposed Chapter 13 Plan of Reorganization.

3 15. Neither JS Partners nor I had any knowledge that the Debtor filed for bankruptcy
4 until August 7, 2024.

5 I Declare under penalty of perjury under the laws of the United States the foregoing is true
6 and correct.

7 This declaration was executed this 12th day of August, 2024 at Sherma Oaks, California.
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10 _____
Jahanzeb Pirvani
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EXHIBIT A

No. 1371778

THE PEOPLE OF THE STATE OF NEW YORK
BY THE GRACE OF GOD FREE AND INDEPENDENT

To all to whom these Presents may come, **GREETING:**

KNOW YE : That we have inspected the files and records in the office of the Clerk of the County of New York, at Manhattan, in County, and do find a certain

JUDGMENT- MONEY

remaining there on file or on record in the words and figures following, to wit :



No. 1371777

Certification

STATE OF NEW YORK, COUNTY OF NEW YORK, SS:

I, Milton Adair Tingling, County Clerk and Clerk of Supreme Court New York County,

do hereby certify that on October 12, 2022 I have compared

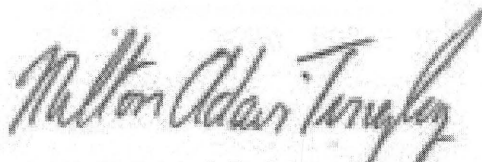
the document attached hereto,

JUDGMENT- MONEY page(s) 3

with the originals filed in my office and the same is a correct transcript

therefrom and of the whole of such original in witness

whereto I have affixed my signature and seal.



**MILTON ADAIR TINGLING
NEW YORK COUNTY CLERK**

SUPREME COURT :
COUNTY OF NEW YORK : STATE OF NEW YORK

-----X
JS PARTNERS 1, LLC.

JUDGMENT

Plaintiff,

Index No. 651495/2022

-against-

JAYESH KUMAR

Defendant.

-----X
The plaintiff having moved pursuant to CPLR §3215(b) for an Order granting a Default Judgment and the defendant having defaulted and said motion having come on regularly to be heard before the Hon. Gerald Leibovits on the 27th day of July, 2022 and the plaintiff's motion having been granted and judgment directed to be entered herein by an Order dated the 9th day of September, 2022.

NOW, on motion of STEIN & STEIN, LLP, attorneys for the plaintiff, it is

PARTNERS 1

ADJUDGED that the plaintiff, JS ~~PARTNERS 1~~, LLC. with its place of business at 240 E. 21st STREET, APT. 1FW NEW YORK, NY 10010 have judgment and do recover of the defendant, JAYESH KUMAR ~~with its principal place of business at 13940 MOORPARK STREET, APT. 401 SHERMAN OAKS CA 91423~~ the following sums:

~~(i)~~ \$110,000.00; with

~~(ii)~~ \$2,474.43 (pre-default interest); and
\$22,132.60

~~(iii)~~ ~~\$21,265.00~~ (interest on \$110,000.00 at 24% per annum from

December 1, 2021 ~~thru September 28, 2022 (291 days) at \$72.33 per day~~
~~291 days),~~ along with

~~(i.e.)~~ \$4,150.00 attorneys fees; and

\$550.00

~~(i.e.)~~ ~~\$635.00~~ costs and disbursements of this action as taxed by

the clerk;

\$139,307.03

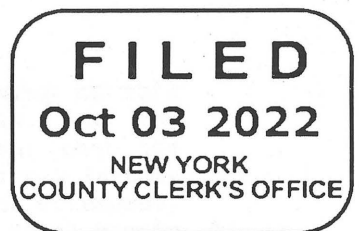
X amounting in all to the sum of ~~\$138,524.25~~ and that ~~post judgment~~
~~interest shall run on the sum of \$110,000.00 at 2% per annum until~~
~~paid and~~ plaintiff have execution therefore.

Judgment entered this 3rd day of Oct. 2022

Clerk

Milton Adam Tordella

ws20357UJB



22 6514

SUPREME COURT :
 COUNTY OF NEW YORK : STATE OF NEW YORK
 -----X
 JS PARTNERS 1, LLC.

OCTOBER 03 2022
 I HEREBY CERTIFY THAT I HAVE
 ADJUSTED THIS BILL OF COSTS AT
 \$550.00

Milton Adam Tordella
 CLERK

BILL OF COSTS

Plaintiff,

-against-

Index No. 651495/2022

JAYESH KUMAR

Defendant.

COSTS

Costs before note of issue. \$200.00

Total costs. \$200.00

DISBURSEMENTS

Fee for index number \$210.00

Serving copy of summons & complaint. ~~85.00~~

RJI. 95.00

Motion Fee 45.00

Total disbursements. ~~\$135.00~~ \$350.00Total costs and disbursements ~~\$635.00~~ \$550.00**ATTORNEY'S AFFIRMATION**

State of New York) ss:

County of Rockland)

The undersigned, an attorney admitted to practice in the courts of this state, affirms: that he is a member of the firm of STEIN & STEIN, LLP, the attorneys of record for the Plaintiff in the above entitled action; that the foregoing disbursements have been or will necessarily be made or incurred in this action and are reasonable in amount and that each of the persons named as witnesses, attended as such witness on the trial, hearing or examination before trial herein the number of days set opposite their names; that each of said persons resided the number of miles set opposite their names, from the place of said trial, hearing or examination; and each of said persons, as such witness as aforesaid necessarily traveled the number of miles so set opposite their names, in traveling to, and the same distance in returning from the same place of trial, hearing or examination; and that copies of documents or papers as charged herein were actually and necessarily obtained for us.

The undersigned affirms that the foregoing statements are true, under the penalties of perjury.

Dated: Haverstraw, New York
 September 19, 2022

William M. Stein
 WILLIAM M. STEIN

20357

STEIN & STEIN
 1 Railroad Square, Haverstraw, NY 10927

845-429-3900

JUDGMENT

1-1
 FILED AND
 DOCKETED
 Oct 03 2022

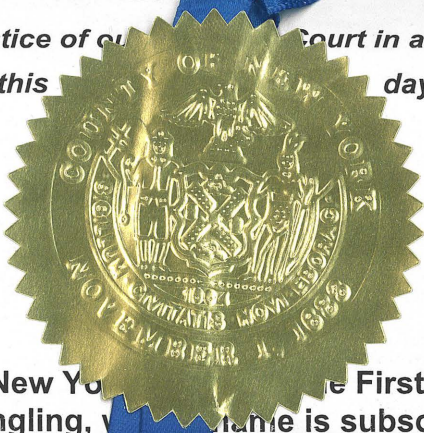
AT 11:41 A M
 N.Y. CO. CLK'S OFFICE

All which we have caused to be exemplified, and the seal of our said Court for said County to be hereunto affixed.

WITNESS

HON. LYLE E. FRANK
J.S.C.

A Justice of the Supreme Court in and for the First Judicial District of said State,
this _____ day of OCT 12 2022 20



HON. LYLE E. FRANK
J.S.C.

Clerk.

I, _____ a Justice of the Supreme Court of the State of New York in and for the First Judicial District thereof, do hereby certify, that Milton Adair Tingling, _____ whose name is subscribed to the preceding exemplification, is the Clerk of the County of New York and Clerk of the Supreme Court in and for said County, and that full faith and credit are to be given to his official acts.

I FURTHER CERTIFY that the Seal affixed to said exemplification is the proper Seal of said Court of said County, and that the attestation thereof is in due form of law and by the proper officer.

WITNESS me at the Borough of Manhattan, this _____ day of _____

OCT 12 2022
in the year 20



A Justice of the Supreme Court of the State of New York
in and for the First Judicial District.

HON. LYLE E. FRANK
J.S.C.

STATE OF NEW YORK
County of New York

I, Milton Adair Tingling, Clerk of the County of New York, and also of the Supreme Court of said County in and for the First Judicial District of said State (said Court being a Court of Record), do hereby certify, that Hon. _____ whose name is subscribed to the foregoing certificate, is a Justice of the Supreme Court of said State in and for the First Judicial District, duly elected and sworn, and that the signature of said Justice to said Certificate is genuine.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Seal of said County and Court, this _____ day of OCT 12 2022 in the year 20

Milton Adair Tingling
Clerk.

EXHIBIT B

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: 111 North Hill Street, Los Angeles, California 90012		FILED Superior Court of California County of Los Angeles 05/03/2023 David W. Slayton, Executive Officer / Clerk of Court By: <u>N. Rose</u> Deputy
PLAINTIFF/PETITIONER: JS Partners 1, LLC		
DEFENDANT/RESPONDENT: Jayesh Kumar		
JUDGMENT BASED ON SISTER-STATE JUDGMENT (Code Civ. Proc., § 1710.25)		CASE NUMBER: 23STCP01425

An application has been filed for entry of judgment based upon judgment entered in the State of:
NEW YORK


Pursuant to Code of Civil Procedure section 1710.25, judgment is hereby entered in favor of plaintiff/judgment creditor

JS PARTNERS 1, LLC

and against defendant/judgment debtor
JAYESH KUMAR

For the amount shown in the application remaining unpaid under said Judgment in the sum of
\$ 139,307.03, together with interest on said Judgment in the sum of \$ 7,076.03, Los Angeles
Superior Court filing fees in the sum of \$ 435.00, costs in the sum of \$ _____, and
interest on said judgment accruing from the time of entry of Judgment at the rate provided by law.

DAVID W. SLAYTON, Executive Officer/Clerk of Court


Dated: 4/27/2023


By: PAUUUO
Deputy Clerk

CERTIFICATE OF MAILING

I, the below named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the **Judgment Based on Sister-State Judgment (Code Civ. Proc., § 1710.25)** upon each party or counsel named below by depositing in the United States mail at the courthouse in LOS ANGELES, California, one copy of the original filed herein in a separate sealed envelope for each address as shown below with the postage thereon fully prepaid.

JS Partners 1, LLC
c/o Nikko S. Stevens
Chora Young & Manasserian LLP
650 Sierra Madre Villa Avenue, Suite 304
Pasadena, California 91107

DAVID W. SLAYTON, Executive Officer/Clerk of Court


Dated: _____

By: PAUUUO
Deputy Clerk

EXHIBIT C

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20230600231



Pages:
0004

Recorded/Filed in Official Records
Recorder's Office, Los Angeles County,
California

09/08/23 AT 01:46PM

FEES:	37.00
TAXES:	0.00
OTHER:	0.00
SB2:	75.00
PAID:	112.00



LEADSHEET



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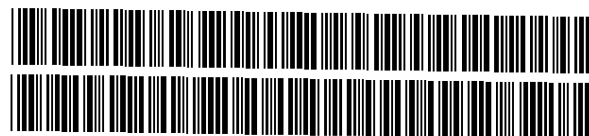
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SECURE - Daily



THIS FORM IS NOT TO BE DUPLICATED

FOR REFERENCE ONLY

Case 2:23-cv-00851-K Doc 36 Filed 08/12/24 Entered 08/12/24 22:04:32 Desc Main Document Page 15 of 19

20230600231

RECORDING REQUESTED BY: JS Partners 1, LLC

WHEN RECORDED MAIL TO:

NAME JS Partners 1, LLC c/o Joseph Chora
Chora Young & Manasserian LLP

MAILING ADDRESS
650 Sierra Madre Villa Avenue, Suite 304

CITY, STATE and ZIP CODE
Pasadena, California 91107

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

TITLE(S)

Amended Abstract of Judgment

B015 rev 20171228

EJ-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, and State Bar number):

After recording, return to:

Joseph Chora [SBN 284700]

Nikko S. Stevens [SBN 305843]

CHORA YOUNG & MANASSERIAN LLP

650 Sierra Madre Villa Avenue, Suite 304

Pasadena, California 91107

TEL NO.: 626.744.1838 FAX NO. (optional): 626.744.3167

E-MAIL ADDRESS (Optional): joseph@cym.law; nikko@cym.law

☒ ATTORNEY FOR ☒ JUDGMENT CREDITOR ☐ ASSIGNEE OF RECORD

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: Same

CITY AND ZIP CODE: Los Angeles, California 90012

BRANCH NAME: Central District – Stanley Mosk Courthouse

FOR RECORDER'S USE ONLY

PLAINTIFF: JS Partners 1, LLC

DEFENDANT: Jayesh Kumar

CASE NUMBER:

23STCP01425

**ABSTRACT OF JUDGMENT—CIVIL
AND SMALL CLAIMS**

☒ Amended

FOR COURT USE ONLY

1. The ☒ judgment creditor ☐ assignee of record
applies for an abstract of judgment and represents the following:

a. Judgment debtor's

Name and last known address

Jayesh Kumar
13940 Moorpark Street, Apt. 401
Van Nuys, California 91432

b. Driver's license no. [last 4 digits] and state: 7368 CA ☐ Unknown

c. Social security no. [last 4 digits]: 4431 ☐ Unknown

d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):

Jayesh Kumar, 13940 Moorpark Street, Apt. 401, Van Nuys, California 91432

2. ☐ Information on additional judgment debtors is
shown on page 2.

4. ☐ Information on additional judgment creditors is
shown on page 2.

3. Judgment creditor (name and address):
JS Partners 1, LLC c/o Chora Young & Manasserian LLP
650 Sierra Madre Villa Avenue, Suite 304
Pasadena, California 91107

5. ☐ Original abstract recorded in this county:

a. Date:

b. Instrument No.:

Date: September 7, 2023

Joseph Chora

(TYPE OR PRINT NAME)

(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:
\$146,818.06

10. ☐ An ☐ execution lien ☐ attachment lien
is endorsed on the judgment as follows:

a. Amount: \$

b. In favor of (name and address):

7. All judgment creditors and debtors are listed on this abstract.

8. a. Judgment entered on (date): May 3, 2023

b. Renewal entered on (date):

9. ☐ This judgment is an installment judgment.

11. A stay of enforcement has

a. ☒ not been ordered by the court.

b. ☐ been ordered by the court effective until
(date):

12. a. ☒ I certify that this is a true and correct abstract of
the judgment entered in this action.

b. ☐ A certified copy of the judgment is attached.

David W. Stlayton, Executive Officer/Clerk of Court

Clerk, by J. Taylor, Deputy

[SEAL]



This abstract issued on (date):

09/08/2023

PLAINTIFF: JS Partners 1, LLC
DEFENDANT: Jayesh Kumar

COURT CASE NO.:
23STCP01425

NAMES AND ADDRESSES OF ADDITIONAL JUDGMENT CREDITORS:

13. Judgment creditor (*name and address*):

14. Judgment creditor (*name and address*):

15. ☐ Continued on Attachment 15.

INFORMATION ON ADDITIONAL JUDGMENT DEBTORS:

16. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

17. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

18. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

19. Name and last known address

Driver's license no. [last 4 digits] and state:

☐ Unknown

Social security no. [last 4 digits]:

☐ Unknown

Summons was personally served at or mailed to (*address*):

20. ☐ Continued on Attachment 20.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
5716 Corsa Avenue, Suite 207, Westlake Village, CA 91362

A true and correct copy of the following document(s) entitled (specify):

DECLARATION OF JAHANZEB PIRVANI IN SUPPORT OF JS PARTNERS 1, LLC'S OBJECTION TO DEBTOR JAYESH KUMAR'S CHAPTER 13 PLAN

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)**
in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **(date) August 12, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On **(date) August 12, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served)**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **(date) August 12, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

HON. VICTORIA S. KAUFMAN
SAN FERNANDO VALLEY DIVISION
U.S. Bankruptcy Court
21041 Burbank Blvd, Suite 354
Woodland Hills, CA 91367

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 12, 2024
Date

Kevin Ronk
Printed Name

/s/ Kevin Ronk
Signature

CONTINUED SERVICE LIST

Served Electronically via CM/ECF System:

- MARCUS COLABIANCHI MCOLABIANCHI@DUANEMORRIS.COM
- JAIME A CUEVAS JCUEVASBKLA@GMAIL.COM, CUEVASJR78473@NOTIFY.BESTCASE.COM
- SHERYL K ITH SITH@COOKSEYLAW.COM
- CATHERINE LIU CLIU@WZTSLAW.COM, MARAKI@WZTSLAW.COM, SFRITZ@WZTSLAW.COM
- MISTY A PERRY ISAACSON MISTY@PPILAWYERS.COM,
ECF@PPILAWYERS.COM; PAGTERANDPERRYISAACSON@JUBILEEBK.NET
- SHELBY A POTEET SPOTEET@FSL.LAW, SSANCHEZ@FSL.LAW; JWILSON@FSL.LAW
- ELIZABETH (SV) F ROJAS (TR) CACB_ECF_SV@CH13WLA.COM
- JACQUELINE D SERRAO JDS@CABKGROUP.COM,
ATTORNEYGARY@GMAIL.COM, BNK@IDEALAWGROUPLLC.COM
- UNITED STATES TRUSTEE (SV) USTPREGION16.WH.ECF@USDOJ.GOV
- DANIEL J WEINTRAUB DWEINTRAUB@WZTSLAW.COM,
MARAKI@WZTSLAW.COM, SFRITZ@WZTSLAW.COM